

VZCZCXRO3073
RR RUEHBC RUEHDBU RUEHFL RUEHKUK RUEHKW RUEHLA RUEHNP RUEHROV RUEHSL
RUEHSR RUEHTRO
DE RUEHRL #0214 0561249
ZNY CCCCC ZZH
R 251249Z FEB 10
FM AMEMBASSY BERLIN
TO RUEHC/SECSTATE WASHDC 6620
INFO RUEHZL/EUROPEAN POLITICAL COLLECTIVE
RUCNIRA/IRAN COLLECTIVE
RUEHGG/UN SECURITY COUNCIL COLLECTIVE
RUEHII/VIENNA IAEA POSTS COLLECTIVE

C O N F I D E N T I A L BERLIN 000214

SIPDIS

E.O. 12958: DECL: 02/25/2020

TAGS: [KNNP](#) [MNUC](#) [PREL](#) [PARM](#) [EFIN](#) [IR](#) [GM](#)

SUBJECT: IRAN SANCTIONS: GERMANY FULLY SUPPORTIVE BUT
PREFERS SPECIFIC VS. BLANKET IRGC DESIGNATIONS

REF: SECSTATE 15554

Classified By: Political M/C George Glass for reasons 1.4 b and d

11. (C) On February 23, Embaffs delivered reftel points on IRGC designations to MFA and Economics Ministry officials. Martin Lutz of the Economics Ministry made it clear that Germany is supportive of the next round of sanctions and is on board with targeting the IRGC. He expressed appreciation for the reftel IRGC designations and added that this type of specific transparent information is extremely useful to the GoG and to the German business community -- noting that the German legal system works better with designations of specific companies and individuals as opposed to blanket designations.

12. (C) Lutz argued that under the German legal system, German companies needed "legal certainty and clarity." He said it would be difficult for German companies to verify if a particular company did or did not belong to the IRGC, especially given the IRGC's penetration into the Iranian economy. He said Germany would have no problem if the list of designations was very long, but Germany strongly preferred "precise, clear-cut, transparent" designations.

13. (C) In response to a question of what to do with the problem of the evasive tactic used to avoid sanctions of changing names of companies affiliated with IRGC, he conceded this remained a problem. To help deal with this, Lutz said Germany kept an informal "grey list" of just such companies which the German intelligence service updates and circulates to the German Industry associations as a first warning mechanism. Lutz cautioned that this list is not legally binding.

14. (C) MFA contacts stressed that Germany shares the goal of designating the IRGC and that the only differences lay in finding the best way to do it. They said the problem of a blanket IRGC designation remained a "real" problem for the German implementation and enforcement entities but that the current planned "solution" being discussed in NY seemed a workable go-around. He said the idea of a blanket designation in a UNSCR to be followed up by a very precise list of specific designations in an accompanying EU implementing resolution would suffice to meet German legal requirements.

Murphy